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VIA EM/ECF

Hon. Keith P. Ellison
United States District Court
515 Rusk Street
Third Floor, Room 3716
Houston, Texas 77002

Re: *Valentine et al. v. Collier et. al.*, No. 4:20-cv-01115: Current COVID-19 Active Cases for Inmates at the Wallace Pack Unit

Dear Judge Ellison:

In light of the declaration presented to the Court identifying a single active case and the statements made by Defendants' counsel last week regarding their impression that the Pack Unit has contained the spread of the virus, we write to note that TDCJ's website currently identifies 14 active cases within the Pack Unit. *See* Exhibit A. We further note that recent news articles both in the United States and abroad substantiate the concern that reinfection is possible.

Given these developments and the concerns articulated at trial by Bryan Collier and Dr. Chad Zawitz that COVID-19 continues to pose a significant threat, we remain convinced (1) that the policy as written and implemented as to the Pack Unit remains insufficient and (2) that the testing protocol and isolation are of critical importance. It is our understanding that at least four of the currently infected inmates in Dormitory 18 were tested last Wednesday but were not advised of their status or removed from their dormitory until Sunday afternoon.

Sincerely,

/s/ Denise Scofield

Denise Scofield

cc: All Counsel of Record (via ECF)